District Judge James L. Robart 1 2 3 4 5 6 UNITED STATES DISTRICT COURT FOR THE 7 WESTERN DISTRICT OF WASHINGTON AT SEATTLE 8 9 JULIO CURY and TAKAO YAMADA, Case No. 2:23-cv-00499-JLR 10 Plaintiffs, STIPULATION FOR AN EXTENSION OF TIME 11 v. DEPARTMENT OF STATE, and Noted for Consideration: 12 DEPARTMENT OF HOMELAND September 18, 2024 SECURITY, 13 14 Defendants. 15 Due to some confusion with Plaintiff's identification of issues to be litigated, the Parties 16 17 continued to meet and confer after the September 6, 2024 deadline. The full set of issues to be 18 litigated is now understood by all parties. While some of these issues may still be resolved short 19 of litigation, the parties will need to file summary judgment briefs. In light of the delay, however, the parties have agreed to extend the earlier proposed briefing schedule by two weeks. 20 21 Thus, the parties stipulate to and propose the following schedule: 22 1. Defendants will file their opening summary judgment brief on any identified issues 23 on or before October 11, 2024; 24 STIPULATION FOR AN EXTENSION OF TIME UNITED STATES ATTORNEY 2:23-cv-00499-JLR - 1 700 STEWART STREET, SUITE 5220

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1	2. Plaintiffs will file their opposition	and cross-motion, if any, on or before November 8,
2	2024;	
3	3. Defendants will file their reply and	d opposition to any cross-motion, if any, on or
4	before November 29, 2024;	
5	4. and Plaintiffs will file their reply in	n support of their cross-motion, if any, on or before
6	December 10, 2024.	
7	DATED this 18th day of September, 2024.	
8	Respectfully submitted,	
9	NATIONAL SECURITY COUNSELORS	TESSA M. GORMAN United States Attorney
10	s/ Kel McClanahan	s/ Nickolas Bohl
1112	KEL MCCLANAHAN, WSBA No. 60671 4702 Levada Terrace Rockville, MD 20853	NICKOLAS BOHL, WSBA No. 48978 <u>s/Katie D. Fairchild</u> KATIE D. FAIRCHILD, WSBA No. 47712
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15 16		Phone: 206-553-7970 Fax: 206-553-4073 Fax: 206-553-4073
17		Email: nickolas.bohl@usdoj.gov katie.fairchild@usdoj.gov
18		Attorneys for Defendants
19		I certify that this memorandum contains 164 words, in compliance with the Local Civil Rules.
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UNITED STATES ATTORNEY 700 STEWART STREET, SUITE 5220 SEATTLE, WASHINGTON 98101 (206) 553-7970

1	[PROPOSED] ORDER
2	It is so ORDERED.
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4	Dated this 19th day of September, 2024.
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6	IAMES I POPART
7	JAMES L. ROBART United States District Judge
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